

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

08 CR. 251 (RMB)

- v - :

IRVING ROMAN :

Defendant. :

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PLEASE TAKE NOTICE that upon the annexed declarations of **Peggy M. Cross, Esq.**, and **Irving Roman**, the undersigned will move this Court, before the **HONORABLE RICHARD M. BERMAN**, United States District Judge for the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, New York, New York, at a time to be designated by the Court, for an order suppressing statements and physical evidence obtained on or about February 26, 2008, as well as any fruits of the unlawful search and seizure, or in the alternative, granting a hearing on this matter, pursuant to Rules 12 and 41 of

the Federal Rules of Criminal Procedure, and granting such other and further relief as the Court deems just and proper.

Dated: New York, New York
June 23, 2008

Respectfully submitted,
LEONARD F. JOY, ESQ.
Federal Defenders of New York

By: _____


PEGGY M. CROSS, ESQ.

Attorney for Defendant

IRVING ROMAN

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TO: **MICHAEL J. GARCIA, ESQ.**
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Attn: **Natalie LaMarque, ESQ.**
Assistant United States Attorney